

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**SALKO RADONCIC, ADIS RADONCIC and HALIL
TODIC**

Plaintiff

Docket No: 14 CV 9169 Rmr

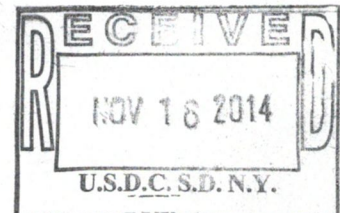
Date Filed:

-against-

**PINNACLE ENTERTAINMENT INC, TROPICANA
ENTERTAINMENT INC., FOUR SEASON HOTELS
LIMITED (aka) FOUR SEASONS HOTELS AND RESORTS
(aka) FOUR SEASONS HOTELS INC.,
and JANE DOE#1 and JOHN DOES# 1-6**
(intended to be employees of Defendants' sued herein,
whose names are unknown, and therefore sues these defendants
by such fictitious names)

Defendant,

JUDGE BERMAN



SUMMONS IN A CIVIL ACTION

**TO: PINNACLE ENTERTAINMENT INC: 3980 Howard Hughes Parkway, Las Vegas, NV
89169.**

**TROPICANA ENTERTAINMENT INC: C T CORPORATION SYSTEM 311 S
Division St, Carson City, NV 89703. The Company's principal Address is 8345 W
Sunset Rd. Suite 200 Las Vegas NV 89113**

**FOUR SEASONS HOTEL LIMITED: C/O C T Corporation System
111 Eighth Avenue New York, New York, 10011. The Company's principal address is
1165 Leslie Street Toronto, Ontario, California, M3c-2k8**

**JANE DOE AND "JOHN DOES NOS 1-6": Four Seasons Hotel, St Louis and Lumiere
Place 999 N 2nd St, St Louis, MO 63102**

A Lawsuit has been filed against you.

Within 21 days after service of this Summons on you (not counting the day you receive it) – or 60days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed.R. Civ. P. 12(a)(2) or (3) – you must serve on the Plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil

Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney whose name and address are:

Rehan Nazrali Esq
78-27 37th Ave #9
Jackson Heights, NY 11372
(347)642-4633

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You must file your answer or motion with the Court.

Clerk of The Court

DOUGLAS C. PALMER

Date: _____
Signature of Clerk or Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**SALKO RADONCIC, ADIS RADONCIC and HALIL
TODIC**

Docket No: **14 CV 9169 RM**

Plaintiff(s),

VERIFIED COMPLAINT

-against-

JURY TRIAL DEMANDED

**PINNACLE ENTERTAINMENT INC, TROPICANA
ENTERTAINMENT INC., FOUR SEASON HOTELS
LIMITED (aka) FOUR SEASONS HOTELS AND RESORTS
(aka) FOUR SEASONS HOTELS INC.,
and JANE DOE#1 and JOHN DOES 1-6
(intended to be employees of Defendants' sued herein,
whose names are unknown, and therefore sues these defendants
by such fictitious names)**

Defendant(s).

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**Plaintiffs SALKO RADONCIC, ADIS RADONCIC and HALIL
TODIC, by their attorney, REHAN NAZRALI ESQ., hereby complaining of the defendants,,
PINNACLE ENTERTAINMENT INC, TROPICANA ENTERTAINMENT INC., FOUR
SEASON HOTELS LIMITED (aka) FOUR SEASONS HOTELS AND RESORTS (aka),
FOUR SEASONS HOTELS INC and JOHN and JANE DOES 1-6 (intended to be employees
of Defendants' sued herein, whose names are unknown, and therefore sues these defendants by
such fictitious names) respectfully show to this Court and allege, upon information and belief, as
follows:**

NATURE OF THE ACTION

1. This is a personal injury action brought against Defendants for serious injuries and damages occasioned to plaintiffs as a result of the wrongful, intentional and negligent acts of the defendants, its owners, employees, servants, agents, and all those who acted under the authority,

direction supervision and control of defendants.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action under 28 U.S.C §§ 1331 since the plaintiffs are residents of the state of New York and the Defendant (**hereinafter “PINNACLE”**) is a Nevada, Las Vegas Corporation and **TROPICANA ENTERTAINMENT INC., (hereinafter “TROPICANA)** is a Nevada, Las Vegas Corporation **FOUR SEASONS HOTELS LIMITED (aka) FOUR SEASONS HOTELS AND RESORTS (aka), FOUR SEASONS HOTELS INC., (hereinafter “FOUR SEASONS”)** is a Toronto Ontario Corporation, **PINNACLE ENTERTAINMENT INC, and JOHN and JANE DOES 1-6** (intended to be employees of Defendants’ sued herein, whose names are unknown, and therefore sues these defendants by such fictitious names) with resulting diversity of citizenship. The matter in controversy exceeds, exclusive of interest, the sum of value specified by 28 U.S.C. §1332. Venue is proper in this Judicial District pursuant § 1391 as Defendant **FOUR SEASONS** is a registered foreign corporation doing business in New York State, maintaining as it also does, business contacts and ownership of properties in the State of New York and having designated New York County as its place of business and thus subjecting itself to personal jurisdiction in the State of New York, specifically in the Southern District of New York.

PARTIES

2. At all times relevant hereto plaintiff **SALKO RADONCIC** (hereinafter **SALKO**) is an individual and resident of the County of Queens in the City and State of New York.

3. At all times relevant hereto plaintiff **ADIS RADONCIC** (Hereinafter **ADIS**) is an individual and resident of the County of Queens in the City and State of New York.

4. At all times relevant hereto plaintiff **HALIL TODIC** (hereinafter **HALIL**) is an

individual and resident of the County of Queens in the City and State of New York.

5. At all times relevant hereto Defendant PINNACLE and was and is a Foreign Business Corporation duly organized and existing under and by virtue of the laws of the State of Nevada.

7. That at all times herein mentioned, the defendant Pinnacle Entertainment, Inc. (Pinnacle), is and was an owner, operator and developer of casinos and related hospitality and entertainment facilities. The Company operates casinos located in St. Louis, Missouri, more commonly known as the Lumiere Place Casino and Four Seasons Hotels, St Louis located at 999 North 2nd Street, St Louis, Missouri.

8. That at all times hereinafter mentioned defendant PINNACLE owned, operated, managed and controlled the Lumeire Place Casino and Four Seasons Hotel, St Louis

9. That upon information and belief, at all times hereinafter mentioned, defendant PINNACLE entered into a management contract with Defendant FOUR SEASONS wherein defendant FOUR SEASONS agreed to manage, maintain, operate, control and supervise the hiring, training, retention and firing of all employees, including but not limited to Security agents and personnel working thereto and thereat for the FOUR SEASONS HOTEL, ST LOUIS and the LUMEIRE PLACE CASINO.

10. At all times relevant hereto Defendant TROPICANA and was and is a Foreign Business Corporation duly organized and existing under and by virtue of the laws of the State of Nevada.

11. That at all times herein mentioned, the defendant Tropicana Entertainment Inc. (TROPICANA) is an owner and operator of regional casino and entertainment properties located in the United States.

12. That in April 2014, defendant TROPICANA completed the acquisition of Lumiere